

FLYNN, DELICH & WISE
ATTORNEYS AT LAW
One World Trade Center, Suite 1800
Long Beach, California 90831-1800
(562) 435-2626

Erich P. Wise/State Bar No. 63219

erichw@fdw-law.com

FLYNN, DELICH & WISE LLP

One World Trade Center, Suite 1800

Long Beach, CA 90831-1800

Telephone: (562) 435-2626 Facsimile: (562) 437-7555

Attorneys for Defendants

TRUMP CARD, INC.

TIFLOR TRANSPORTATION, LLC (dba TRUMP CARD SAN DIEGO)

TRUMP CARD HOLDINGS, INC.

TRUMP CARD CALIFORNIA, INC.

MAGNATE HOLDINGS, LLC

MAGNATE WORLDWIDE, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

THE BOARD OF TRUSTEES OF THE

LELAND STANFORD JUNIOR UNIVERSITY,

Plaintiff,

v.

TRUMP CARD, INC. (a California corporation

and LLC); TIFLOR TRANSPORTATION, LLC

(a California LLC) (dba TRUMP CARD SAN

DIEGO); TRUMP CARD HOLDINGS, INC. (a

California corporation and LLC); TRUMP CARD

CALIFORNIA, INC. (a California corporation

and LLC); SIMPATICO, INC. (a California

corporation); MAGNATE HOLDINGS, LLC

(corporate status unknown); MAGNATE

WORLDWIDE, LLC (an Illinois LLC);

GHUMAN TRANSPORT CORPORATION (a

California corporation); BIRKIRAN SINGH (a

California resident); RAPID TRUCKING, LLC (a

California corporation and LLC); TRANS

XPRESS LINE, INC. (a California corporation

and LLC); JERMAINE MARKEES TURNER (a

California resident); and DOES 1 through 50,

inclusive,

Defendants.

Case No.:

DEFENDANTS TRUMP CARD, INC.,

TIFLOR TRANSPORTATION, LLC (DBA

TRUMP CARD SAN DIEGO), TRUMP

CARD HOLDINGS, INC., TRUMP CARD

CALIFORNIA, INC., MAGNATE

HOLDINGS, LLC, AND MAGNATE

WORLDWIDE, LLC'S NOTICE OF

REMOVAL OF ACTION UNDER 28

U.S.C. § 1441(a)

(FEDERAL QUESTION)

28 U.S.C. § 1331, §1337(a), 1441(a)

49 U.S.C. § 14706(d)

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendants Magnate Worldwide, LLC, Magnate Holdings, LLC, Trump Card Holdings, Inc., Trump Card California, Inc., Trump Card, Inc., and Tiflor Transportation, LLC dba Trump Card San Diego (hereinafter "Petitioners"), hereby remove the above-entitled action from state court to the United States District Court, Northern District of California, on the following grounds:

1. On December 14, 2017, an action was commenced in the Superior Court of the State of California, County of San Mateo, entitled *The Board of Trustees of the Leland Stanford Junior University, Plaintiffs vs. Trump Card, Inc.; Tiflor Transportation, LLC (dba Trump Card San Diego); Trump Card Holdings, Inc.; Trump Card California, Inc.; Simpatico, Inc.; Magnate Holdings, LLC; Magnate Worldwide, LLC; Ghuman Transport Corporation; Birkiran Singh; Rapid Trucking, LLC; Tranx Xpress Line, Inc; Jermaine Markeese Turner; and Does 1 to 50, inclusive, Defendants*, as case number 17CIV05727.

2. On February 6, 2018, Plaintiff filed an Amendment to the Complaint, substituting Landstar System, Inc. and Pride Logistics for Doe Defendants 1 and 2.

3. On February 21, 2018, Plaintiff filed an Amendment to the Complaint, correcting the name of Doe Defendant 1 from Landstar System, Inc. to Landstar Express America, Inc.

4. Petitioners were served with the Summons and Complaint on February 8, 2018.

5. This action is civil in nature and is brought by Plaintiff to recover damages relating to claims of property loss, breach of contract and negligence relating to cargo that was damaged on or about January 24, 2017 while the cargo was being transported by motor carrier in interstate commerce.

6. In the Complaint, Plaintiff alleges that Petitioners, along with Defendants Simpatico, Inc., Ghuman Transport Corporation, Birkiran Singh, Rapid Trucking, LLC, and Does 1-20 ("Contracting Defendants") "were engaged in the business of interstate and intrastate transportation of goods, and owned, operated, controlled, drove, and managed

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vehicles for that purpose.” Plaintiff has asserted causes of action for breach of contract and negligence against the Contracting Defendants, who Plaintiff claims were contracted to “transport a device known as a ‘wiggler’ from Lemont, Illinois to Plaintiff’s facility in Menlo Park, California”, when Contracting Defendants’ vehicle was involved in an accident on January 24, 2017 in New Mexico, resulting in damage to the wiggler.

7. Plaintiff further alleges that Defendants Trans Xpress Line, Inc., Jermaine Markees Turner, and Does 21-30 (the “Non-Contract Defendants”) were “engaged in the business of interstate and intrastate transportation of goods, and owned, operated, controlled, drove, and managed vehicles for that purpose.” Plaintiff alleges that the Non-Contracting Defendants were negligently “operating their vehicle on a public roadway in the State of New Mexico when [they] were involved in a subsequent accident near the location of the first accident involving the Contracting Defendants’ vehicle, resulting in further damage to and the near destruction of the ‘wiggler’ being transported by the Contracting Defendants.”

8. **Jurisdiction:** Based on the foregoing, the allegations of the Complaint establish that this is an action involving alleged loss of goods or damage to goods arising out of the interstate carriage of those goods by a motor common carrier. This Court has original jurisdiction over this action under 28 U.S.C. § 1331, §1337(a), and 49 U.S.C. § 14706(d), and the case may be removed to this Court by Petitioners under 28 U.S.C. § 1441(a) because Plaintiff’s claims arise under 49 U.S.C. § 14706 and any state law claims are preempted by 49 U.S.C. § 14706. *Hall v. North American Van Lines, Inc.*, 476 F.3d 683, 688 (9th Cir. 2007).

9. **Intradistrict Assignment:** Under Local Rule 3-2(c), this action should be assigned to the San Francisco Division or the Oakland Division because the state court action is pending in San Mateo County.

10. Counsel for defendants Rapid Trucking, LLC and Landstar Express America, Inc. have advised that they consent to removal of this action. No other defendants have appeared in this action. On March 7, 2018, Gina Beltramo, Esq. of Coddington, Hicks & Danforth, counsel for Defendants Birkiran Singh and Ghuman Transportation Corporation, advised that she has not received instructions from her clients regarding whether they consent

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1 to removal of this action. Ms. Beltramo advised she will contact Petitioners as soon as she
2 receives instructions from her clients. Although Plaintiff has filed Proofs of Service of
3 Summons on Defendants Simpatico, Inc. and Jermaine Markees Turner, Petitioners are unable
4 to confirm whether these Defendants consent to removal as they have yet to appear in this
5 action and Petitioners were unable to locate contact information for these Defendants.
6 Although Plaintiff has filed a Proof of Service of Summons on Pride Logistics, on March 7,
7 2018, Richard Thorne, the agent for service of process for Pride Logistics advised that he was
8 never served with the Summons and Complaint. On March 7, 2018, Amandeep Rathore, the
9 agent for service of process for Trans Xpress Line, Inc., advised that he has referred the matter
10 to his insurance carrier and was unable to consent to removal without speaking to his insurance
11 carrier. Mr. Rathore advised that he will contact Petitioners after speaking to his insurance
12 carrier.

13 11. Petitioners further file herewith true and correct copies of the Summons and
14 Complaint, filed in the state court, and all other pleadings, process and orders served on
15 Petitioners in the state court action (attached as Exhibit A hereto).

16 WHEREFORE, Petitioners request that the captioned action pending in the Superior
17 Court of the State of California, County of San Mateo, be removed to this United States
18 District Court, Northern District of California, and that all proceedings in the Superior Court of
19 California in the matter be discontinued.

20 Dated: March 8, 2018

FLYNN, DELICH & WISE LLP

21 By:

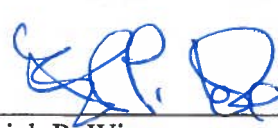
22 
23 _____
24 Erich P. Wise
25 Attorneys for Defendants
26 TRUMP CARD, INC.
27 TIFLOR TRANSPORTATION, LLC
28 (dba TRUMP CARD SAN DIEGO)
TRUMP CARD HOLDINGS, INC.
TRUMP CARD CALIFORNIA, INC.
MAGNATE HOLDINGS, LLC
MAGNATE WORLDWIDE, LLC

Exhibit A

1 Keith C. Bower, Esq. (State Bar No. 135243)
 2 Bower • von Raesfeld
 (Not a Partnership)
 3 900 Lafayette Street, Suite 706
 Santa Clara, CA 95050
 Telephone: 408/261-1200
 4 Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

5 Attorneys for Plaintiff
 6 THE BOARD OF TRUSTEES OF THE
 LELAND STANFORD JUNIOR UNIVERSITY

FILED
 SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 9 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

17CIV05727

10 THE BOARD OF TRUSTEES OF THE
 11 LELAND STANFORD JUNIOR
 12 UNIVERSITY,

13 Plaintiff,

14 v.

15 TRUMP CARD, INC. (a California
 corporation and LLC); TIFLOR
 16 TRANSPORTATION, LLC (a California
 LLC) (dba TRUMP CARD SAN DIEGO);
 17 TRUMP CARD HOLDINGS, INC. (a
 California corporation and LLC); TRUMP
 18 CARD CALIFORNIA, INC. (a California
 corporation and LLC); SIMPATICO, INC. (a
 19 California corporation); MAGNATE
 20 HOLDINGS, LLC (corporate status
 unknown); MAGNATE WORLDWIDE,
 21 LLC (an Illinois LLC); GHUMAN
 22 TRANSPORT CORPORATION (a
 California corporation); BIRKIRAN SINGH
 23 (a California resident); RAPID TRUCKING,
 24 LLC (a California corporation and LLC);
 TRANS XPRESS LINE, INC. (a California
 25 corporation); JERMAINE MARKEES
 TURNER (a California resident); and DOES
 26 1 to 50, inclusive;

27 Defendants.

Case No.:

COMPLAINT FOR DAMAGES
 [DAMAGE TO PROPERTY,
 PROPERTY LOSS, BREACH OF
 CONTRACT, NEGLIGENCE]

BY FAX

17 – CIV – 05727
 CMP
 Complaint
 876882



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COMPLAINT FOR DAMAGES
 [DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 COMES NOW Plaintiff THE BOARD OF TRUSTEES OF THE LELAND
2 STANFORD JUNIOR UNIVERSITY, and alleges as follows:

3 **ALLEGATIONS COMMON TO EACH CAUSE OF ACTION**

4 1. Stanford is informed and believes and thereon alleges that all but one of the
5 Defendants referenced above are residents (corporate, LLC or individual) of the State of
6 California. Stanford alleges that all of the Defendants, and each of them, are legally
7 responsible to Stanford in damages as a consequence of the acts, omissions, breaches of
8 contract, and breaches of other duties implied and imposed by law, all of which led to
9 Stanford's damages as set forth in the instant Complaint.

10 2. Defendants TRUMP CARD, INC. (a California corporation and LLC); TIFLOR
11 TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP
12 CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD
13 CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California
14 corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE
15 WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a
16 California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING, LLC
17 (a California corporation and LLC); and DOES 1 through 20, inclusive, (hereinafter the
18 "Contracting Defendants") contracted with Stanford and/or were subcontractors, employees or
19 agents of a Contracting Defendant, and are liable to Plaintiff for breach of contract, negligent
20 employment, and other associated theories, as alleged more fully below. Defendants TRANS
21 EXPRESS, LINE, INC., JERMAINE MARKEES TURNER and DOES 21 through 40,
22 inclusive (hereinafter the "Non-Contracting Defendants") did not contract directly with
23 Stanford and are responsible for Plaintiff's damages solely on the basis of negligence, negligent
24 employment, or other tortious conduct.

25 3. Stanford is informed and believes that each and every Defendant, in performing
26 the services for Stanford or other associated entities or individuals, or acting within the course
27 and scope of employment or agency of each of the remaining Defendants, acted directly and/or
28 derivatively and as a result each and every Defendant is a co- or joint-tortfeasor, so that the

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COMPLAINT FOR DAMAGES
[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 liability alleged in this Complaint inures to each and every Defendant, whether liability is based
 2 upon individual activities or omissions implied and inherent within said agency and/or
 3 employment, or otherwise.

4 4. Stanford is unaware of the true names and capacities, whether individual,
 5 corporate, associate, or otherwise of defendants sued herein as DOES 1 through 50, inclusive,
 6 and therefore sues these defendants by such fictitious names under the provisions of California
 7 Code of Civil Procedure §474 and/or other applicable law. Stanford will ask leave to amend
 8 this Complaint to allege said defendants' true names and capacities when they have been
 9 ascertained. Stanford is informed and believes and thereon alleges that each of the fictitiously
 10 named defendants is negligently responsible in some manner or otherwise legally responsible
 11 for the occurrences and damages herein described.

12 5. Stanford is informed and believes and thereon alleges that at all times herein
 13 mentioned Defendants TRUMP CARD, INC. (a California corporation and LLC); TIFLOR
 14 TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP
 15 CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD
 16 CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California
 17 corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE
 18 WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a
 19 California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING, LLC
 20 (a California corporation and LLC); and DOES 1 through 20, inclusive, and each of them (the
 21 "Contracting Defendants,") were the agents, servants, employers and/or employees of each the
 22 other Contracting Defendants and in doing the things hereinafter alleged were acting within the
 23 scope of such agency, service and/or employment and with the permission and consent of said
 24 Contracting Defendants referenced in this paragraph. Stanford is also informed and believes
 25 and thereon alleges that at all times herein mentioned, each of the Contracting Defendants was
 26 acting within the course and scope of a joint venture with each of the other Contracting
 27 Defendants, and on that basis alone, each contracting Defendant owes a duty to hold Stanford
 28 harmless in respect of the breach of contract, negligence, or other legal theories underpinning

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COMPLAINT FOR DAMAGES

[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 all of the Defendants' liabilities to Stanford herein.

2 6. Stanford is informed and believes and thereon alleges that at all times herein
3 mentioned Defendants TRANS XPRESS LINE, INC., JERMAINE MARKEES TURNER, and
4 DOES 21 through 40, inclusive (the "Non-Contracting Defendants") were the agents, servants,
5 employers and/or employees of each of the other Non-Contracting Defendants and in doing the
6 things hereinafter alleged were acting within the scope of such agency, service and/or
7 employment and with the permission and consent of said Non-Contracting Defendants
8 referenced in this paragraph. Stanford is also informed and believes and thereon alleges that at
9 all times herein mentioned each and every one of the Non-Contracting Defendants was acting
10 within the course and scope of a joint venture with each other and each of the other
11 Non-Contracting Defendants, and on that basis alone, each said Defendant owes a duty to hold
12 Stanford harmless in respect of the negligence or other legal theories underpinning all of the
13 Defendants' liabilities to Stanford herein.

14 7. Stanford is informed and believes and thereon alleges that at all times herein
15 mentioned the Contracting Defendants, and each of them, were engaged in the business of
16 interstate and intrastate transportation of goods, and owned, operated, controlled, drove, and
17 managed vehicles for that purpose. Said Contracting Defendants, and each of them, at all times
18 relevant were aware that their failure to professionally and competently perform the services
19 they were contracted to perform, i.e., to safely transport from Lemont, Illinois to Plaintiff's
20 facility in the City of Menlo Park, County of San Mateo, California, a device used in a particle
21 accelerator, could and would result in significant financial losses to Stanford. Said device is a
22 series of magnets designed to periodically laterally deflect ('wiggle') a beam of charged
23 particles, such as electrons. Said device is colloquially and will hereafter be referred to a
24 "wiggler." Stanford reasonably relied at all times relevant upon said Contracting Defendants to
25 provide transportation services in a competent manner so as to safely transport the "wiggler"
26 from Illinois to California. However, said Contracting Defendants breached this contract and
27 obligation, thus causing the "wiggler" to be damaged en route to California, resulting in the
28 damages herein claimed.

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COMPLAINT FOR DAMAGES

[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 8. Stanford is further informed and believes and thereon alleges that the
2 Non-Contracting Defendants and each of them, were engaged in the business of interstate and
3 intrastate transportation of goods, and owned, operated, controlled, drove, and managed
4 vehicles for that purpose. Said Non-Contracting Defendants owed a legal duty to others,
5 including Stanford, to conduct themselves properly and at all times within the law and not to
6 conduct themselves negligently, carelessly, recklessly, or otherwise so as to cause harm to
7 others, including Stanford and its property interests as set forth herein. However, despite such
8 duty, said Non-Contracting defendants operated their vehicle negligently, carelessly, recklessly,
9 and otherwise wrongfully, so as to directly and legally cause Stanford's losses as herein
10 claimed.

11 9. Stanford is informed and believes and thereon alleges that at all times herein
12 mentioned the Contracting Defendants undertook to transport the "wiggler" from Lemont,
13 Illinois to Plaintiff's facility in the City of Menlo Park, County of San Mateo, California. On or
14 about January 24, 2017, Defendants' vehicle was involved in an accident (hereinafter referred
15 to as "the first accident") in the State of New Mexico, resulting in damage to the "wiggler" and
16 resulting in Plaintiff's losses as herein claimed.

17 10. Stanford is informed and believes and thereon alleges that at all times herein
18 mentioned the Non-Contracting Defendants, and each of them, were operating their vehicle on
19 a public roadway in the State of New Mexico when said Non-Contracting Defendants were
20 involved in a subsequent accident (hereinafter referred to as "the second accident") near the
21 location of the first accident involving the Contracting Defendants' vehicle, resulting in further
22 damage to and the near destruction of the "wiggler" being transported by the Contracting
23 Defendants as above-described.

24 11. As a direct and legal result of the negligence, carelessness, and recklessness of
25 Defendants, and each of them, Plaintiff Stanford has been injured by way of damage to and the
26 near destruction of the scientific property known as the "wiggler," for the cost of the
27 transportation of the "wiggler" from the scene of the accidents in New Mexico to a repair
28 facility in Lemont, Illinois, for the repair of the said "wiggler," and for other damages

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COMPLAINT FOR DAMAGES
[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 according to proof.

2 12. As a further direct and legal result of the negligence, carelessness and
3 recklessness of Defendants, and each of them, and the resulting losses and damages as
4 hereinbefore described, Stanford is entitled to pre-judgment interest at the legal rate according
5 to proof and in an amount to be determined, and is also entitled to attorney's fees as allowable
6 by law and by contract.

7 13. Venue and jurisdiction properly lies within the County of San Mateo, State of
8 California as the contract for delivery of the "wiggler" to Stanford's facility in the City of
9 Menlo Park, County of San Mateo, State of California was entered into in the City of
10 Menlo Park, County of San Mateo, State of California. The Superior Court of the State of
11 California is the proper jurisdiction and forum for the determination of the rights and liabilities
12 of the parties herein.

13 **WHEREFORE**, Stanford prays for judgment as hereinafter set forth.

14 **FIRST CAUSE OF ACTION**

15 **Breach of Contract against Contracting Defendants:**

16 **TRUMP CARD, INC. (a California corporation and LLC); TIFLOR**
17 **TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO);**
18 **TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD**
19 **CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a**
20 **California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown);**
21 **MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT**
22 **CORPORATION (a California corporation); BIRKIRAN SINGH (a California resident);**
23 **RAPID TRUCKING, LLC (a California corporation and LLC); and DOES 1 through 20,**
24 **inclusive**

25 14. Plaintiff re-alleges and incorporates by this reference as though fully set forth
26 herein the allegations of paragraphs 1-13, inclusive.

27 15. Plaintiff and the "Contracting Defendants", including TRUMP CARD, INC. (a
28 California corporation and LLC); TIFLOR TRANSPORTATION, LLC (a California LLC)
(dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California
corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and
LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC
(corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN

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COMPLAINT FOR DAMAGES

[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 TRANSPORT CORPORATION (a California corporation); BIRKIRAN SINGH (a California
 2 resident); RAPID TRUCKING, LLC (a California corporation and LLC); and DOES 1 through
 3 20, inclusive, engaged in a contractual relationship by which Defendants agreed to faithfully,
 4 professionally, reasonably, safely, and in good faith and fair dealing transport a device known
 5 as a "wiggler" from Lemont, Illinois to Plaintiff's facility in Menlo Park, California. Plaintiff
 6 fulfilled all of the requirements of the above-mentioned contract. However, on or about
 7 January 24, 2017, Defendants, and each of them, breached their duty to faithfully,
 8 professionally, reasonably, safely, and in good faith and fair dealing perform the referenced
 9 services in a competent manner.

10 16. Defendants' breach of the contract above-described has resulted in property and
 11 other damages to Plaintiff, according to proof.

12 17. The contract between Stanford and the "Contracting Defendants", and each of
 13 them, may potentially call for an award of attorney's fees and costs in the event of a breach or
 14 other act, error, and/or omission. Therefore, Stanford prays for an award of attorney's fees,
 15 interest, and costs as against all Defendants herein mentioned.

16 18. Stanford does not attach a copy of its contractual arrangements with the
 17 Contracting Defendants herein as the same may be subject to privacy rights. However, a copy
 18 of said written contractual arrangements will be made the subject of proper discovery and, in
 19 any event, Stanford is informed and believes and thereon alleges that Defendants have such
 20 copies in their possession.

21 19. Stanford is informed and believes and thereon alleges that the value of its claims
 22 in this matter well exceed the jurisdictional minimum of this Court (thus the matter is filed in
 23 "unlimited" jurisdiction).

24 **WHEREFORE**, Stanford prays for judgment as hereinafter set forth on multiple causes
 25 of action (see *infra*).

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27 ///

28 ///

SECOND CAUSE OF ACTION

Negligence against all Defendants

Plaintiff re-alleges and incorporates by reference as though fully set forth herein the allegations of paragraphs 1-13, inclusive.

20. On or about January 24, 2017, Defendants, and each of them, negligently, carelessly, and recklessly owned, operated, controlled, and drove their vehicles so as to cause two separate single-vehicle accidents, both of which caused damage to Plaintiff's property, namely the "wiggler". Contracting Defendants TRUMP CARD, INC. (a California corporation and LLC); TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC) and Does 1 – 5, inclusive, were further negligent in the subcontracting of said contract for transport of the "wiggler" to Contracting Defendants GHUMAN TRANSPORTATION CORP. (a California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING (a California corporation and LLC); and Does 6 – 10, inclusive. Contracting Defendants TRUMP CARD, INC. (a California corporation and LLC); TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORTATION CORPORATION (a California corporation); RAPID TRUCKING, LLC (a California corporation and LLC); and Does 6 – 10, inclusive and each of them, were further negligent in the hiring of Defendant BIRKIRAN SINGH to operate the vehicle which was to transport the magnetic "wiggler" from Illinois to California, in that said Contracting Defendants, and each of them, knew or should have known that Defendant SINGH did not possess the class of driver's license required to lawfully operate the vehicle to which he was assigned, and was

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COMPLAINT FOR DAMAGES

[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 unable to safely operate said vehicle. Non-Contracting Defendants TRANS EXPRESS, LINE,
 2 INC. (a California corporation); and DOES 21 through 30, inclusive, were further negligent in
 3 the hiring of Defendant JERMAINE MARKEES TURNER in that said Non-Contracting
 4 Defendants knew, or should have known, that Defendant JERMAINE MARKEES TURNER
 5 was unable to safely operate the vehicle involved in the second accident.

6 21. As a legal and proximate result of the negligence, recklessness, and carelessness
 7 of Defendants, and each of them, Plaintiff has suffered damage to and the near destruction of a
 8 magnetic device known as the "wiggler". These multiple breaches of duties to Plaintiff have
 9 resulted in Stanford's damages referenced herein.

10 WHEREFORE, Stanford prays for judgment as hereinafter set forth on multiple causes
 11 of action (see *infra*).

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
 14 follows:

- 15 1. For all consequential breach of contract and tort damages according to proof at
 16 the time of trial (which damages well exceed the "unlimited jurisdiction" threshold of this
 17 Court);
- 18 2. For pre-judgment interest according to proof at the time of trial;
- 19 3. For attorney's fees according to proof at the time of trial;
- 20 4. For costs of suit incurred herein; and,

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1 5. For such other and further relief as the Court may deem just and proper under
2 the circumstances.

3 Respectfully Submitted,

4 BOWER • von RAESFELD

5
6 Dated: December 13, 2017

by: 

Keith C. Bower
Attorney for Defendant
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): KEITH C. BOWER, ESQ. SRN: 135243 Bower von Rosafeld 900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050 TELEPHONE NO.: 408-261-1200 FAX NO.: 408-985-9042		FOR COURT USE ONLY ENDORSED FILED SAN MATEO COUNTY DEC 14 2017 Clerk of the Superior Court UNA FINAL REPLY DATE								
ATTORNEY FOR (Name): STANFORD UNIVERSITY SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Southern Branch: Hall of Justice and Records										
CASE NAME: THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY v. TRUMP CARD, INC., et al.										
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;">CIVIL CASE COVER SHEET</td> <td style="text-align: center;">Complex Case Designation</td> <td style="text-align: center;">CASE NUMBER</td> </tr> <tr> <td style="width: 33%; vertical-align: top;"> <input checked="" type="checkbox"/> Unfiled (Amount demanded exceeds \$25,000) </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) </td> <td style="width: 33%; vertical-align: top; text-align: center;"> 17C1V05727 JUDGE: DISTRICT: </td> </tr> </table>			CIVIL CASE COVER SHEET		Complex Case Designation	CASE NUMBER	<input checked="" type="checkbox"/> Unfiled (Amount demanded exceeds \$25,000)	<input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	17C1V05727 JUDGE: DISTRICT:
CIVIL CASE COVER SHEET		Complex Case Designation	CASE NUMBER							
<input checked="" type="checkbox"/> Unfiled (Amount demanded exceeds \$25,000)	<input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	17C1V05727 JUDGE: DISTRICT:							

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other P/PC/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (27) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/PC/WD (23) Non-P/PC/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (18) <input type="checkbox"/> Intellectual property (16) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/PC/WD tort (45) Employment <input type="checkbox"/> Wrongful termination (26) <input type="checkbox"/> Other employment (15)	Contract <input checked="" type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (15) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/involuntary condemnation (14) <input type="checkbox"/> Wrongful eviction (53) <input type="checkbox"/> Other real property (28) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (28) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (38)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.469) <input type="checkbox"/> Antitrust/Trade regulation (08) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
--	---	---

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve c. <input type="checkbox"/> Substantial amount of documentary evidence	d. <input type="checkbox"/> Large number of witnesses e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court f. <input type="checkbox"/> Substantial postjudgment judicial supervision
--	--

3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive

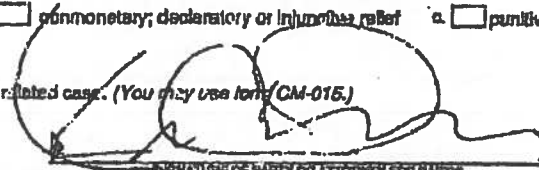
4. Number of causes of action (specify): TWO

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related cases. (You may use form CM-015.)

Date: December 14, 2017

KEITH C. BOWER, ESQ.
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE	
<ul style="list-style-type: none"> Plaintiff must file this cover sheet with the first paper filed in this action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions. File this cover sheet in addition to any cover sheet required by local court rules. If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding. Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only. 	
Form Adopted for Mandatory Use Judicial Council of California CM-010 (Rev. July 1, 2007)	Page 1 of 5 Cal. Rules of Court, rules 3.230, 3.235, 3.400-3.469, 3.740 Cal. Two-Judge of Judicial Administration, vol. 2, 10 www.courtinfo.org Wordstar 8.0 Page 1/1

CIVIL CASE COVER SHEET

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 8.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money were entitied on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort Auto (22)-Personal Injury/Property Damage/Wrongful Death Uninsured Motorist (48) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto) Other PUPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Automobile (24) Automobile Property Damage Automobile Personal Injury/Wrongful Death Product Liability (not asbestos or toxic/environmental) (34) Medical Malpractice (45) Medical Malpractice-Physicians & Surgeons Other Professionals: Health Care Malpractice Other PUPD/WD (23) Premises Liability (e.g., slip and fall) Intentional Bodily Injury/FD/WD (e.g., assault, vandalism) Intentional Infliction of Emotional Distress Negligent Infliction of Emotional Distress Other PUPD/WD Non-PUPD/WD (Other) Tort Business Tort/Breast Business Practices (07) Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08) Detention (e.g., wander, lock) (13) Fraud (18) Intellectual Property (19) Professional Negligence (25) Legal Malpractice Other Professional Malpractice (not medical or legal) Other Non-PUPD/WD Tort (35) Employment Wrongful Termination (32) Other Employment (15)	Contract Breach of Contract/Warranty (06) Breach of Rental Lease Contract (not unilateral detainer or wrongful eviction) Contract/Warranty Breach-Seller Plaintiff (not fraud or negligence) Negligent Breach of Contract/Warranty Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (09) Collection Case-Seller Plaintiff Other Promissory Note/Collections Case Insurance Coverage (not provisionally complex) (10) Auto Subrogation Other Coverage Other Contract (37) Contractual Fraud Other Contract Dispute Real Property Eminent Domain/Inverse Condemnation (14) Wrongful Eviction (36) Other Real Property (e.g., quiet title) (30) Writ of Possession of Real Property Mortgage Foreclosure Quiet Title Other Real Property (not eminent domain, landlord/tenant, or foreclosure) Unlawful Detainer Commercial (31) Residential (32) Drug (33) (if this case involves drug charges, check this item; otherwise, report as Commercial or Residential) Judicial Review Asset Forfeiture (05) Petition Re: Arbitration Award (11) Writ of Habeas (02) Writ-Administrative Mandamus Writ-Mandamus on Limited Court Case Matter Writ-Other Limited Court Case Review Other Judicial Review (30) Review of Health Officer Order Notice of Appeal-Labor Commissioner Appeals	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403) Arbitration/Trade Regulation (03) Construction Defect (10) Claims Involving Mass Tort (40) Securities Litigation (26) Environmental/Toxic Tort (38) Insurance Coverage Claims (arising from provisionally complex case type listed above) (41) Enforcement of Judgment Enforcement of Judgment (20) Abolition of Judgment (Out of County) Contention of Judgment (non-judicial relations) Broker-Share Judgment Administrative Agency Award (not unpaid taxes) Petition/Certification of Entry of Judgment on Unpaid Taxes Other Enforcement of Judgment Case Miscellaneous Civil Complaint RICO (77) Other Complaint (not specified above) (42) Declaratory Relief Only Injunctive Relief Only (non-harassment) Mechanics Lien Other Commercial Complaint Case (non-tort/non-employment) Other Civil Complaint (non-tort/non-employment) Miscellaneous Civil Petition Partnership and Corporate Governance (21) Other Petition (not specified above) (45) Civil Harassment Workplace Violence Elder/Dependent Adult Abuse Election Contest Petition for Name Change Petition for Relief From Late Claim Other Civil Petition
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CM-010 (Rev. July 1, 2007)

CIVIL CASE COVER SHEET

Page 2 of 2

NOTICE OF CASE MANAGEMENT CONFERENCE

*The Board of Trustees of
the Leland Stanford Junior University*
vs.
Trump Card, Inc et al

17-CIV-05727
NCMC
Notice of Case Management Conference
876900



FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court
DANIEL CLARK

Case No:

17CIV05727

Date:

APR 20 2018

Time 9:00 a.m.

Dept.

Dept. 24

--on Tuesday & Thursday

--on Wednesday & Friday

You are hereby given notice of your Case Management Conference. The date, time and department have been written above.

1. In accordance with applicable California Rules of the Court and local Rules 2.3(d)1-4 and 2.3(m), you are hereby ordered to:

- Serve all named defendants and file proofs of service on those defendants with the court within 60-days of filing the complaint (CRC 201.7).
- Serve a copy of this notice, Case Management Statement and ADR Information Sheet on all named parties in this action.
- File and serve a completed Case Management Statement at least 15-days before the Case Management Conference [CRC 212(g)]. Failure to do so may result in monetary sanctions.
- Meet and confer, in person or by telephone, to consider each of the issues identified in CRC 212(f) no later than 30-days before the date set for the Case Management Conference.

2. If you fail to follow the orders above, you are ordered to show cause why you should not be sanctioned. The Order to Show Cause hearing will be at the same time as the Case Management Conference hearing. Sanctions may include monetary, evidentiary or issue sanctions as well as striking pleadings and/or dismissal.

3. Continuances of Case Management Conferences are highly disfavored unless good cause is shown.

4. Parties may proceed to an appropriate dispute resolution process ("ADR") by filing a Stipulation to ADR and Proposed Order (see attached form). If plaintiff files a Stipulation to ADR and Proposed Order electing to proceed to judicial arbitration, the Case Management Conference will be taken off the court calendar and the case will be referred to the Arbitration Administrator. If plaintiffs and defendants file a completed stipulation to another ADR process (e.g., mediation) 10-days prior to the first scheduled Case Management Conference, the Case Management Conference will be continued for 90-days to allow parties time to complete their ADR session. The court will notify parties of their new Case Management Conference date.

5. If you have filed a default or a judgment has been entered, your case is not automatically taken off Case Management Conference Calendar. If "Does", "Roes," etc. are named in your complaint, they must be dismissed in order to close the case. If any party is in bankruptcy, the case is stayed only as to that named party.

6. You are further ordered to appear in person* (or through your attorney of record) at the Case Management Conference noticed above. You must be thoroughly familiar with the case and fully authorized to proceed.

7. The Case Management judge will issue orders at the conclusion of the conference that may include:

- Referring parties to voluntary ADR and setting an ADR completion date;
- Dismissing or severing claims or parties;
- Setting a trial date.

8. The Case Management judge may be the trial judge in this case.

For further information regarding case management policies and procedures, see the court's website at: www.sanmateocourt.org

*Telephonic appearances at case management conferences are available by contacting CourtCall, LLC, an independent vendor, at least five business days prior to the scheduled conference (see attached CourtCall information).

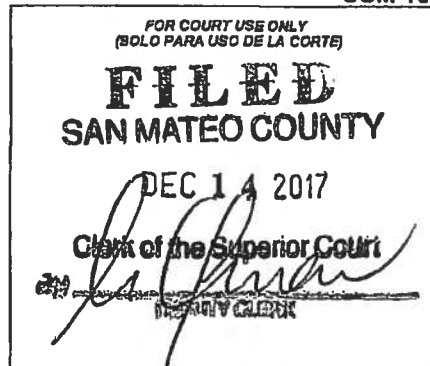
EXHIBIT A

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(**AVISO AL DEMANDADO:**) LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(**LO ESTÁ DEMANDANDO EL DEMANDANTE:**) THE LELAND STANFORD
JUNIOR UNIVERSITY



NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desahogar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

CASE NUMBER: 17CV05727
(Número del Caso):

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reasfeld
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

DATE: DEC 14 2017, Clerk, by RODINA M. CATALANO (Secretario) 408-261-1200, Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
4. ☐ by personal delivery on (date):

17 - CIV - 05727

SUM
Summons Issued / Filed
876884



SUM-200(A)

SHORT TITLE: STANFORD UNIVERSITY v. TRUMP CARD, INC., et al.	CASE NUMBER:
--	--------------

INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
 → If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff ☒ Defendant ☐ Cross-Complainant ☐ Cross-Defendant

TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING LLC (a California corporation and LLC); TRANS XPRESS LINE, INC. (a California corporation); JERMAINE MARKEES TURNER (a California resident); and DOES 1 to 50, inclusive

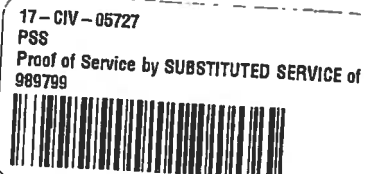
Page 1 of 1

Page 1 of 1

POS-010

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050</p> <p>TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <p>FILED SAN MATEO COUNTY</p> <p>FEB 21 2018</p> <p><i>[Signature]</i> Clerk of the Superior Court</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO</p> <p>STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>CASE NUMBER: 17 CIV 05727</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	<p>Ref. No. or File No.:</p>

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Birkiran Singh (A California Resident)
4. Address where the party was served:
 2550 East Seville Ave, Anaheim, CA 92806
5. I served the party
 - b. by substituted service. On 2/16/2018 at 8:33 am I left the documents listed in item 2 with or in the presence of:
 John Doe (refused name) / Occupant
 - (2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - a. as an individual defendant.



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. **Person who served papers**

- a. Name: Bryan Canas
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. **The fee for the service was:**
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1603
 - (iii) County: Riverside

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV C5727
DECLARATION OF DUE DILIGENCE	Ref. No. or File No.:

1. I Bryan Canas, am at least 18 years of age and not a party to this action.
2. Documents to be served:

 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. Party to be served:

 Birkiran Singh (A California Resident), 2550 East Seville Ave, Anaheim, CA 92806
4. Details of diligence:
 - 02/07/2018 8:05 PM Attempted Service. No answer.
 - 02/08/2018 7:13 AM Attempted Service. No answer.
 - 02/09/2018 1:24 PM Attempted Service. Per John Doe (Middle Eastern Male approx. 70yrs old), he stated that subject does not live here. He stated that subject bought a home in Moreno Valley and provided subject's phone number 714-452-7113.
 - 02/14/2018 12:00 PM Received instructions from client/attorney to drop serve at this address no matter what any occupant claims about subject living here or not.
 - 02/16/2018 8:33 AM Attempted Service - I was informed the defendant does not reside here. Server drop/sub-served documents, per client instruction, to occupant John Doe (refused name).
5. Person attesting to diligence:

 Name: Bryan Canas
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
 I am a registered California process server: Independent contractor
 Registration No.: 1603
 County: Riverside

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	------------------------------

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(PRINTED NAME)


(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		
DECLARATION OF MAILING		CASE NUMBER: 17 CIV 05727 Ref. No. or File No.:

POS-010

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050</p> <p>TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <p>FILED</p> <p>SAN MATEO COUNTY</p> <p>FEB 21 2018</p> <p>Clerk of the Superior Court</p> <p><i>[Signature]</i></p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO</p> <p>STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>CASE NUMBER: 17 CIV 05727</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	<p>Ref. No. or File No.:</p>

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Ghuman Transport Corporation (a California Corporation)
4. Address where the party was served:
 7050 Melrose St, Unit C, Buena Park, CA 90621
5. I served the party
 - b. by **substituted service**. On 2/16/2018 at 8:06 am I left the documents listed in item 2 with or in the presence of:
 Agent, Umair S. Khan, President, by serving Gurpreet Khan, occupant / Authorized To Accept
 Description: Age: 40, Sex: m, Race/Skin Color: M.E., Height: 5'6", Weight: 150, Hair: black, Glasses: n
 - (2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Ghuman Transport Corporation (a California Corporation)
 under the following Code of Civil Procedure section:
 416.10 (corporation)

17 - CIV - 05727
 PSS
 Proof of Service by SUBSTITUTED SERVICE of
 989540



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. **Person who served papers**

- a. Name: Bryan Canas
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1603
 - (iii) County: Riverside

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(NAME OF PERSON WHO SERVED PAPERS)


(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF DUE DILIGENCE	Ref. No. or File No.:

1. I Bryan Canas, am at least 18 years of age and not a party to this action.
2. Documents to be served:

 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. Party to be served:

 Ghuman Transport Corporation (a California Corporation), 7050 Melrose St Unit C, Buena Park, CA 90621
4. Details of diligence:

02/08/2018 7:45 PM 02/09/2018 7:33 AM 02/11/2018 10:30 AM 02/14/2018 12:00 PM 02/16/2018 8:06 AM	Attempted Service. No answer. Attempted Service. No answer. Attempted Service. Server told by occupant that there is no one at given address who is affiliated with the company and the agent is unknown. Received instructions from client/attorney to drop serve at this address no matter what any occupant claims about subject living here or not. Attempted Service - I was informed the agent is unknown at this address and there is no one here affiliated with the company. Drop/sub-service completed, per client instruction, by serving Gurpreet Khan, occupant of residence.
--	--
5. Person attesting to diligence:

 Name: Bryan Canas
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
 I am a registered California process server: independent contractor
 Registration No.: 1603
 County: Riverside

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	------------------------------

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(PRINTED NAME)


(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	Ref. No. or File No.:

- I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.
- Documents mailed:

 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
- A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

 Date: 2/16/2018
 Location: San Jose, CA
 Addressed: Ghuman Transport Corporation (a California Corporation), 7050 Melrose St
 Unit C, Buena Park, CA 90621
- Person performing mailing:


 Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

2/21/18

Michael R. Mezzetti

(PRINTED NAME)

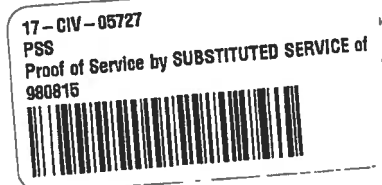


(SIGNATURE)

POS-010

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <p>FILED SAN MATEO COUNTY</p> <p>FEB 15 2018</p> <p><i>Clerk of the Superior Court</i></p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	<p>CASE NUMBER 17 CIV 05727</p> <p>BY FAX</p>
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>Ref. No. or File No.:</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Jermaine Markees Turner (A California Resident)
4. Address where the party was served:
 330 "T" Street, Bakersfield, CA 93304
5. I served the party
 - b. by substituted service. On 2/9/2018 at 12:30 pm I left the documents listed in item 2 with or in the presence of:
 Ruthina Doe (refused last name) / Co-Occupant
 Description: Age: 51+, Sex: f, Race/Skin Color: A.A., Height: 5'8", Weight: 170, Hair: black, Glasses: n
 - (2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Jermaine Markees Turner (A California Resident)
 under the following Code of Civil Procedure section:
 416.10 (corporation)



PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. **Person who served papers**

- a. **Name:** Gina A. Calvillo
Firm: County Process Service, Inc.
- b. **Address:** 31 E. Julian Street, San Jose, CA 95112
- c. **Telephone number:** (408) 297-6070
- d. **The fee for the service was:**
- e. **I am:**
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 722
 - (iii) County: Kern County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/18/18

Gina A. Calvillo

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727 <div style="text-align: right;">BY FAX</div>
DECLARATION OF DUE DILIGENCE		Ref. No. or File No.:

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	Ref. No. or File No.:

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.

2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/12/2018
 Location: San Jose, CA
 Addressed: Jermaine Markees Turner (A California Resident), 330 "T" Street,
 Bakersfield, CA 93304

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/15/18

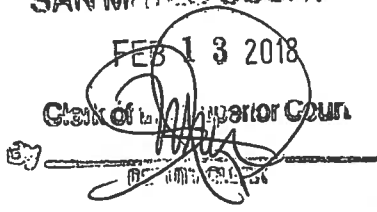
Michael R. Mezzetti

(PRINTED NAME)

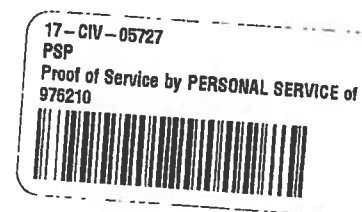


(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 13 2018 Clerk of the Superior Court 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. **Party served:**
 Landstar System, Inc, as Doe 1
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 Agent, CT Corporation System by serving Daisy Montenegro / Authorized To Accept
4. **Address where the party was served:**
 818 W Seventh St, Ste 930, Los Angeles, CA 90017
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 1:50 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - b. as the person sued under the fictitious name of:
 as Doe 1
 - d. On behalf of: Landstar System, Inc, as Doe 1
 under the following Code of Civil Procedure section:
 416.10 (corporation)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. **Person who served papers**

- a. Name: Carlos Canas
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 4571
 - (iii) County: Los Angeles

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/16

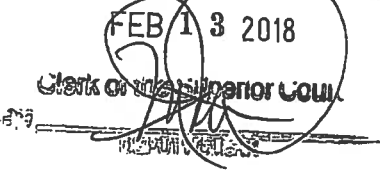
Carlos Canas

(NAME OF PERSON WHO SERVED PAPERS)

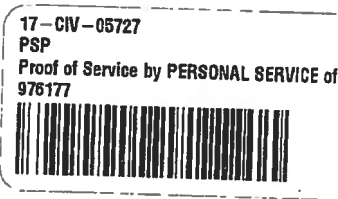


(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY <div style="text-align: center;"> FILED SAN MATEO COUNTY FEB 13 2018 Clerk of the Superior Court  </div>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. **Party served:**
 Magnate Holdings, LLC (corporate status unknown)
- b. **Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):**
 C/O Erich Wise, Esq. / Authorized To Accept
4. **Address where the party was served:**
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 d. On behalf of: Magnate Holdings, LLC (corporate status unknown)
 under the following Code of Civil Procedure section:
 415.95 (business organization, form unknown)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. **Person who served papers**

- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/21/18

Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)

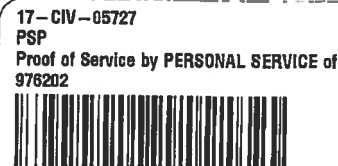


(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 13 2018 <i>[Signature]</i> of the Superior Court
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
 Magnate Worldwide, LLC (an Illinois LLC)
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Magnate Worldwide, LLC (an Illinois LLC)
 under the following Code of Civil Procedure section:
 other: LLC



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. **Person who served papers**

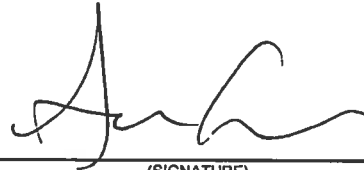
- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

3. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

POS-010

<p>4/20 CME</p> <p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050</p> <p>TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <p>FILED SAN MATEO COUNTY</p> <p>FEB 15 2018</p> <p>Clerk of the Superior Court</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO</p> <p>STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	<p>CASE NUMBER: 17 CIV 05727</p>
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>Ref. No. or File No.:</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Pride Logistics as Doe 2
4. Address where the party was served:
 1776 Hawaii Circle, Costa Mesa, CA 92626
5. I served the party
 - b. by substituted service. On 2/11/2018 at 2:36 pm I left the documents listed in item 2 with or in the presence of:
 Agent, Richard Thorne, by serving John Doe (refused name), Apparently in Charge /
 Authorized To Accept
 Description: Age: 30, Sex: m, Race/Skin Color: cauc., Height: 6', Weight: 190, Hair: brown, Glasses: n
 - (3) (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.

17-CIV-05727
 PCSBC
 Proof of Service on CORPORATION, LLC, etc.
 980788



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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6. The "Notice to the Person Served" (on the summons) was completed as follows:
- b. as the person sued under the fictitious name of:
as Doe 2
 - d. On behalf of: Pride Logistics as Doe 2
under the following Code of Civil Procedure section:
other: LLC
7. **Person who served papers**
- a. Name: Bryan Canas
Firm: County Process Service, Inc.
 - b. Address: 31 E. Julian Street, San Jose, CA 95112
 - c. Telephone number: (408) 297-6073
 - d. The fee for the service was:
 - e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1603
 - (iii) County: Riverside
8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/13/18

Bryan Canas

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF DUE DILIGENCE	Ref. No. or File No.:

1. I Bryan Canas, am at least 18 years of age and not a party to this action.

2. Documents to be served:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. Party to be served:

Pride Logistics as Doe 2, 1776 Hawaii Circle, Costa Mesa, CA

4. Details of diligence:

02/08/2018 6:58 PM Attempted Service. No answer.
 02/09/2018 8:48 AM Attempted Service. No answer.
 02/11/2018 2:36 PM Attempted Service - I was informed the Agent was not in. He is the homeowner and it is his normal place of mailing. I suberved occupant of residence John Doe (refused name).

5. Person attesting to diligence:

Name: Bryan Canas
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
 I am a registered California process server: independent contractor
 Registration No.: 1603
 County: Riverside

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	------------------------------

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/13/18

Bryan Canas

(PRINTED NAME)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	Ref. No. or File No.:

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.

2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/13/2018
 Location: San Jose, CA
 Addressed: Pride Logistics as Doe 2, 1776 Hawaii Circle, Costa Mesa, CA

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/15/18

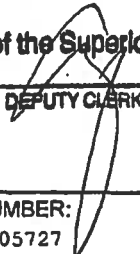
Michael R. Mezzetti

(PRINTED NAME)

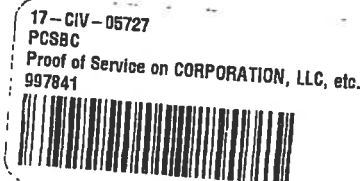


(SIGNATURE)

POS-010

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050</p> <p>TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY FILED SAN MATEO COUNTY</p> <p>FEB 26 2018</p> <p>Clerk of the Superior Court By  DEPUTY CLERK</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>CASE NUMBER: 17 CIV 05727 BY FAX</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	<p>Ref. No. or File No.:</p>

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Rapid Trucking LLC (a California Corporation and LLC)
- b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 Agent, Gurtej S. Gill, President, by serving Cheryl Gibson, Accounting Manager /
 Authorized To Accept
4. Address where the party was served:
 5822 Price Ave, Ste 104, McClellan Park, CA 95652
5. I served the party
 - b. by substituted service. On 2/13/2018 at 4:24 pm I left the documents listed in item 2 with or in the presence of:
 Agent, Gurtej S. Gill, President, by serving Cheryl Gibson, Accounting Manager /
 Authorized To Accept
 - (1) (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Rapid Trucking LLC (a California Corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. Person who served papers

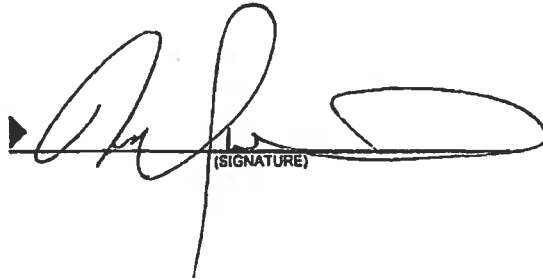
- a. Name: Nikifor Yakushchenko
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 2017-16
 - (iii) County: Sacramento

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/22/19

Nikifor Yakushchenko

(NAME OF PERSON WHO SERVED PAPERS)


(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 90C Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	Ref. No. or File No.:

- I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.
- Documents mailed:

 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
- A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

 Date: 2/14/2018
 Location: San Jose, CA
 Addressed: Agent, Gurtej S. Gill, President, by serving Cheryl Gibson, Accounting Manager / Authorized To Accept, 5822 Price Ave, Ste 104, McClellan Park, CA 95652
- Person performing mailing:

 Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/21/18

Michael R. Mezzetti

(PRINTED NAME)



(SIGNATURE)

POS-010

<p><i>4/20</i> <i>Cme</i></p> <p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050</p> <p>TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <p>FILED SAN MATEO COUNTY</p> <p>FEB 15 2018</p> <p>Clerk of the Superior Court</p> <p><i>[Signature]</i></p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO</p> <p>STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	<p>CASE NUMBER: 17 CIV 05727</p>
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>Ref. No. or File No.:</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Simpatico, Inc. (a California Corporation)
4. Address where the party was served:
 462 Stevens Ave, Ste 303, Solano Beach, CA 92057
5. I served the party
 - b. **by substituted service.** On 2/12/2018 at 8:52 am I left the documents listed in item 2 with or in the presence of:
 Agent, Gayle Mayfield - Venieris, by serving Donna Walker, receptionist / Authorized To Accept
 - (1) **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Simpatico, Inc. (a California Corporation
 under the following Code of Civil Procedure section:
 416.10 (corporation)

17 - CIV - 05727
 PCSBC
 Proof of Service on CORPORATION, LLC, etc.
 980800



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. **Person who served papers**

- a. Name: Manuel Robles
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 3346
 - (iii) County: San Diego

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/14/18

Manuel Robles

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	Ref. No. or File No.:

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.

2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/13/2018
 Location: San Jose, CA
 Addressed: Simpatico, Inc. (a California Corporation, 462 Stevens Ave, Ste 303, Solano Beach, CA 92057)

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/15/18

Michael R. Mezzetti

(PRINTED NAME)



(SIGNATURE)

4/20
CME

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 13 2018 Clerk of the Superior Court
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
 Tiflor Transportation, LLC (a California LLC) (dba Trump Card San Diego)
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
3. The "Notice to the Person Served" (on the summons) was completed as follows:
 - b. as the person sued under the fictitious name of:
 dba Trump Card San Diego
 - d. On behalf of: Tiflor Transportation, LLC (a California LLC) (dba Trump Card San Diego)
 under the following Code of Civil Procedure section:
 other: LLC

 17-CIV-05727
 PSP
 Proof of Service by PERSONAL SERVICE of
 977114


Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	------------------------------

7. **Person who served papers**

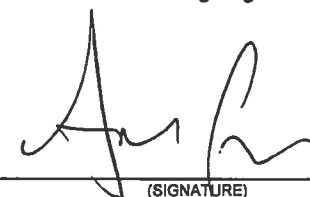
- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)

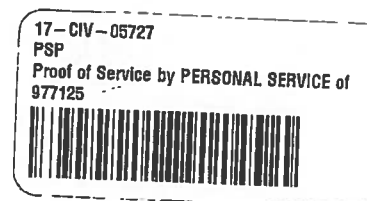


(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 13 2018 Clerk of the Superior Court
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
 Trump Card California, Inc. (a California corporation and LLC)
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Trump Card California, Inc. (a California corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	------------------------------

7. **Person who served papers**


- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

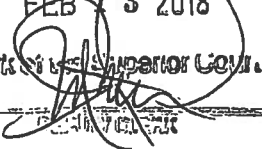
(NAME OF PERSON WHO SERVED PAPERS)



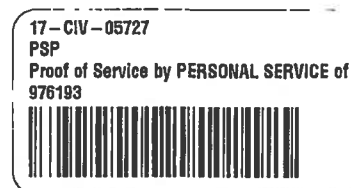
(SIGNATURE)

4/20
CME

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 3 2018 Clerk of the Superior Court 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. **Party served:**
 Trump Card Holdings, Inc. (a California corporation and LLC)
 - b. **Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):**
 C/O Erich Wise, Esq. / Authorized To Accept
4. **Address where the party was served:**
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Trump Card Holdings, Inc. (a California corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. **Person who served papers**


- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

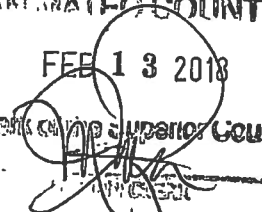
Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)

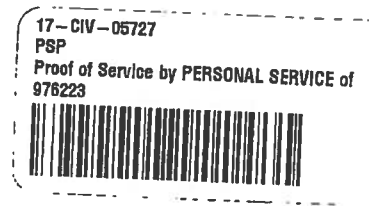


(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY <div style="text-align: center;"> FILED SAN MATEO COUNTY FEB 13 2018  Clerk of Court </div>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
 Trump Card, Inc. (a California Corporation and LLC)
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Trump Card, Inc. (a California Corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	------------------------------

7. **Person who served papers**

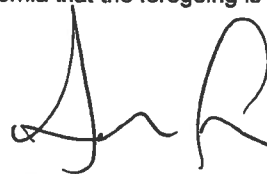
- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)



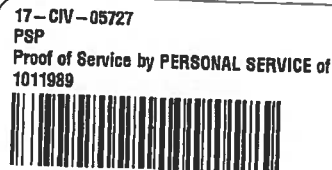
(SIGNATURE)

4/20
cmc

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY MAR 02 2018 Clerk of the Superior Court By <u>DEPUTY CLERK</u>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727 BY FAX
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Trans Xpress Line, Inc. (a California Corporation)
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 Agent, Amandeep Singh Rathore, President / Authorized To Accept
4. Address where the party was served:
 6317 Grant Wood St, Bakersfield, CA 93312
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/10/2018 at 1:18 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Trans Xpress Line, Inc. (a California Corporation)
 under the following Code of Civil Procedure section:
 416.10 (corporation)



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
--	-------------------------------------

7. **Person who served papers**

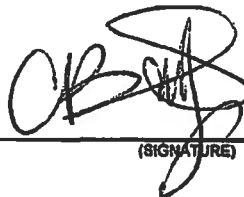
- a. **Name:** Cheyenne B. Safley
Firm: County Process Service, Inc.
- b. **Address:** 31 E. Julian Street, San Jose, CA 95112
- c. **Telephone number:** (408) 297-6070
- d. **The fee for the service was:**
- e. **I am:**
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 620
 - (iii) County: Kern Co.

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 3/1/18

Cheyenne B. Safley

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

FILED
SAN MATEO COUNTY

FEB 21 2018

Clerk of the Superior Court

DEPUTY CLERK

Keith C. Bower, Esq. (State Bar No. 135243)
Bower - von Raesfeld
(Not a Partnership)
900 Lafayette Street, Suite 706
Santa Clara, CA 95050
Telephone: 408/261-1200
Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

Attorneys for Plaintiff
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

BY FAX

THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY,

Plaintiff,

v.

TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
California corporation); MAGNATE
HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
LLC (a California corporation and LLC);
TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
TURNER (a California resident); and DOES
1 to 50, inclusive;

Defendants.

Case No.: 17 CIV 05727

PLAINTIFF'S AMENDMENT TO
COMPLAINT CORRECTING NAME
OF DOE 1

Complaint Filed: December 14, 2017
Trial Date: TBA **AXD**

17 - CIV - 05727

ATC

Amendment to Complaint

989545



1 Plaintiff, THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR
2 UNIVERSITY hereby amends its amendment to complaint substituting true name for fictitious
3 name, filed February 6, 2018, to correct the name of DOE Defendant 1, sued herein as Landstar
4 System, Inc., to Landstar Express America, Inc.

5 Respectfully Submitted,

6 BOWER • von RAESFELD

7
8 Dated: February 20, 2018

by: 

9 Keith C. Bower
10 Attorney for Plaintiff
11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR
13 UNIVERSITY
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1 **Stanford University v. Trump Card, Inc., et al.**
 2 Santa Clara County Superior Court Case No.: **17-CIV-05727**

3 **PROOF OF SERVICE**

4 I am over the age of eighteen years and not a party to the within-entitled action. I am
 5 employed in Santa Clara County, California, with the law firm of Bower • von Raesfeld. My business
 6 address is 900 Lafayette Street, Suite 706, Santa Clara, California 95050.

7 On February 20, 2018, I served upon the interested party(ies) in the action the following
 8 document(s) described as:

9 **PLAINTIFF'S AMENDMENT TO COMPLAINT CORRECTING NAME OF DOE 1**

10 ☒ by placing ☐ the original ☒ true copies thereof enclosed in sealed envelopes addressed to:

11 **SEE ATTACHED MAILING LIST**

12 ☒ **BY U.S. MAIL** I deposited such envelope(s), with said postage thereon fully prepaid in the
 13 United States mail at a facility regularly maintained by the United States Postal Service at
 14 Santa Clara, California. I am "readily familiar" with the firm's practice of collecting and pro-
 15 cessing correspondence for mailing. Under this practice, the envelope is deposited with the
 16 U.S. Postal Service on that same day with postage thereon fully prepaid at Santa Clara,
 17 California, in the ordinary course of business.

18 ☐ **BY U.S. CERTIFIED MAIL** I deposited such envelope(s), with said postage thereon fully
 19 prepaid in the United States mail, Certified Mail, at a facility regularly maintained by the
 20 United States Postal Service at Santa Clara, California. I am "readily familiar" with the firm's
 21 practice of collecting and processing correspondence for mailing. Under the practice it would
 22 be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid
 23 at Santa Clara, California, in the ordinary course of business.

24 ☐ **RETURN RECEIPT REQUESTED, U.S. MAIL**

25 ☐ **WITH CERTIFICATE OF MAILING** A certificate of mailing was obtained from the
 26 United States Post Office evidencing the mailing referenced above.

27 ☐ **BY FEDERAL EXPRESS** I caused such envelope(s) to be placed for FedEx collection and
 28 delivery at Santa Clara, California. I am "readily familiar" with the firm's practice of col-
 lecting and processing correspondence for FedEx mailing. Under the practice it would be
 deposited with the FedEx Office on that same day with instructions for overnight delivery,
 fully prepaid, at Santa Clara, California, in the ordinary course of business.

☐ **BY FACSIMILE** I caused transmission of the foregoing document(s) by facsimile to the
 offices of the addressee(s), and such transmission was reported as complete and without error.

☐ **BY ELECTRONIC MAIL** I caused the transmission of the foregoing document(s) by elec-
 tronic mail to the offices of the addressee(s) at the e-mail addresses listed above.

☐ **BY PERSONAL SERVICE** I personally delivered this envelope by hand to the offices of
 the addressee(s) listed above, pursuant to CCP §1011, by a person apparently in charge
 thereof.

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
 foregoing is true and correct.

PROOF OF SERVICE

Page 1 of 3

☐ (FEDERAL) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on February 20, 2018, at Santa Clara, California.


Elaine Durand

SERVICE LIST

Erich Wise
Flynn, Delich & Wise, LLP
One World Trade Center, Suite 1800
Long Beach, CA 90831-1800

Attorneys for Defendants
TRUMP CARD, INC.; TRUMP
HOLDINGS, INC.; TRUMP CARD
CALIFORNIA, INC.; MAGNATE
HOLDINGS, LLC; MAGNATE
WORLDWIDE LLC; TIFLOR
TRANSPORTATION, LLC

Gina Beltramo
Coddington, Hicks & Danforth
555 Twin Dolphin Drive, Suite 300
Redwood City, CA 94065

Attorneys for Defendants
GHUMAN TRANSPORTATION
CORPORATION; BIRKIRAN SINGH

Nareshwar Singh Virdi
Acquest Law, Inc.
1900 Point West Way, Suite 270
Sacramento, CA 95815

Attorneys for Defendant
RAPID TRUCKING, LLC

Gordon McAuley
Williams & Gumbiner, LLP
100B Drakes Landing Road, Suite 260
Greenbrae, CA 94904

Attorneys for Defendant
LANDSTAR EXPRESS AMERICA, INC.
(Previously named as DOE 1 Landstar
Systems, Inc.)

PROOF OF SERVICE

Page 3 of 3

EXHIBIT A

64

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

5 Attorneys for Plaintiff
6 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

10 THE BOARD OF TRUSTEES OF THE
11 LELAND STANFORD JUNIOR
UNIVERSITY,

12 Plaintiff,

13
14 v.

15 TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
16 TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
17 TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
18 CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
19 California corporation); MAGNATE
HOLDINGS, LLC (corporate status
20 unknown); MAGNATE WORLDWIDE,
21 LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
22 California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
23 LLC (a California corporation and LLC);
24 TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
25 TURNER (a California resident); and DOES
1 to 50, inclusive;

26 Defendants.
27
28

Case No.: 17CIV05727

DEFENDANT THE BOARD OF BY FAX
TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY'S
NOTICE OF DEPOSIT OF JURY FEES

17 – CIV – 05727
NPJF
Notice of Posting Jury Fees
876899



1
2 PLEASE TAKE NOTICE that Defendant THE BOARD OF TRUSTEES OF THE
3 LELAND STANFORD JUNIOR UNIVERSITY has deposited jury fees in the amount of
4 \$150.00 in the above referenced case.

5 Respectfully Submitted,

6 BOWER • von RAESFELD

7
8 Dated: December 13, 2017

by: 

9 Keith C. Bower
10 Attorney for Defendant
11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR
13 UNIVERSITY
14
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4/20 CMC
1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

5 Attorneys for Plaintiff
6 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

10 THE BOARD OF TRUSTEES OF THE
11 LELAND STANFORD JUNIOR
UNIVERSITY,

12 Plaintiff,

13
14 v.

15 TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
16 TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
17 TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
18 CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
19 California corporation); MAGNATE
20 HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
21 LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
22 California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
23 LLC (a California corporation and LLC);
24 TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
25 TURNER (a California resident); and DOES
1 to 50, inclusive;

26 Defendants.
27
28

FILED
SAN MATEO COUNTY

JAN 11 2018

Clerk of the Superior Court
By [Signature]
DEPUTY CLERK

Case No.: 17 CIV 05727

NOTICE OF UNAVAILABILITY

F A X E D

17 – CIV – 05727

NUA

Notice of Unavailability of Counsel

918178



RECEIVED
SAN MATEO COUNTY

JAN 11 2018

. Clerk of the Superior Court

TO DEFENDANTS AND THEIR ATTORNEY OF RECORD:

NOTICE IS HEREBY GIVEN that commencing February 16, 2018 through and including February 23, 2018, KEITH C. BOWER, Esq., attorney for Plaintiff The Board of Trustees of the Leland Stanford Junior University will be traveling out of the country and will be unavailable for any purpose whatsoever including, but not limited to, receiving notice of any kind, responding to *ex parte* applications, appearing in court, appearing at depositions, conferences or participating in trial.

PLEASE BE ADVISED that purposefully scheduling a conflicting proceeding without good cause is sanctionable conduct. *See Tenderloin Housing Clinic v. Sparks*, (1992) 8 Cal.App.4th 299, 10 Cal.Rptr. 2nd 371.

Respectfully Submitted,

BOWER • von RAESFELD

Dated: January 8, 2018

by: 

Keith C. Bower
Attorney for Plaintiff
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
5 kcb@bowervonraesfeld.com

6 Attorneys for Plaintiff
7 THE BOARD OF TRUSTEES OF THE
8 LELAND STANFORD JUNIOR UNIVERSITY

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR
13 UNIVERSITY,

14 Plaintiff,

15 v.

16 TRUMP CARD, INC. (a California
17 corporation and LLC); TIFLOR
18 TRANSPORTATION, LLC (a California
19 LLC) (dba TRUMP CARD SAN DIEGO);
20 TRUMP CARD HOLDINGS, INC. (a
21 California corporation and LLC); TRUMP
22 CARD CALIFORNIA, INC. (a California
23 corporation and LLC); SIMPATICO, INC. (a
24 California corporation); MAGNATE
25 HOLDINGS, LLC (corporate status
26 unknown); MAGNATE WORLDWIDE,
27 LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
LLC (a California corporation and LLC);
TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
TURNER (a California resident); and DOES
1 to 50, inclusive;

28 Defendants.

ENDORSED FILED
SAN MATEO COUNTY

FEB 06 2018

Clerk of the Superior Court
~~UNA FINAL~~
~~DEPUTY CLERK~~

Case No.: 17 CIV 05727

**PLAINTIFF THE BOARD OF
TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY'S
AMENDMENT TO COMPLAINT
SUBSTITUTING TRUE NAMES FOR
FICTITIOUS NAME FAXED**

Complaint Filed: December 14, 2017
Trial Date: TBA

-1-

PLAINTIFF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S
AMENDMENT TO COMPLAINT SUBSTITUTING TRUE NAMES FOR FICTITIOUS NAME

1 At the time of the filing of the Complaint, Plaintiff was ignorant of the true names of
 2 certain defendants and stated said fact in the Complaint and designated the defendants by
 3 fictitious names. Having discovered the true names of certain defendants, Plaintiff hereby
 4 amends the Complaint on file by inserting the following true names in place and instead of such
 5 fictitious name wherever it appears in the Complaint pursuant to Code of Civil Procedure §474:

FICTITIOUS NAME:

DOE 1

DOE 2

TRUE NAME:

LANDSTAR SYSTEM, INC.

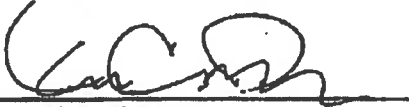
PRIDE LOGISTICS

Respectfully Submitted,

BOWER • von RAESFELD

Dated: February 5, 2018

by:


 Keith C. Bower
 Attorney for Plaintiff
 THE BOARD OF TRUSTEES OF THE
 LELAND STANFORD JUNIOR
 UNIVERSITY

4/20
Cmc

1 Gordon McAuley (99932)
2 WILLIAMS & GUMBINER LLP
3 100 Drakes Landing Road, Suite 260
4 Greenbrae, CA 94904
5 Phone: (415) 755-1880
6 gmcauley@williamsgumbiner.com
7
8 Attorneys for Defendant and Cross-Complainant
9 LANDSTAR EXPRESS AMERICA, INC.

FILED
SAN MATEO COUNTY

MAR 01 2018

Clerk of the Superior Court
By 
DEPUTY CLERK

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO

11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR UNIVERSITY,

13 Plaintiff,

14 vs.

15 TRUMP CARD, INC., et al.,

16 Defendants.

Case No. 17 CIV 05727

**CROSS-COMPLAINT FOR BREACH OF
CONTRACT; EQUITABLE INDEMNITY;
AND CONTRIBUTION**

Complaint Filed: 12/14/17
Trial Date: n/a

18 LANDSTAR EXPRESS AMERICA, INC.

19 Cross-Complainant,

20 vs.

21 GHUMAN TRANSPORT CORPORATION and
22 ROES 1 THROUGH 50,

23 Cross-Defendants.

17 - CIV - 05727
CCMP
Cross Complaint
1006385



24 Defendant and Cross-Complainant LANDSTAR EXPRESS AMERICA, INC.
25 ("LANDSTAR") Cross-complains against Defendant and Cross-defendant GHUMAN
26 TRANSPORT CORPORATION ("GHUMAN") as follows:
27
28

File By Fax

GENERAL ALLEGATIONS

1
2 1. At all times relevant to this lawsuit, Cross-Complainant LANDSTAR was and is a
3 corporation authorized to do and doing business within the State of California.

4 2. At all times relevant herein, Cross-Defendant GHUMAN, was a corporation,
5 authorized to and doing business within the State of California.

6 3. That the true names and capacities, whether individual, corporate, associate or
7 otherwise, of cross-defendants ROES 1 through 50, inclusive, and each of them, are unknown to
8 this Cross-Complainant who, therefore, sues said cross-defendants by such fictitious names, and,
9 Cross-Complainant prays that when the true names and capacities are ascertained, it may have
10 leave to file its amendment as to the true names and capacities together with appropriate charging
11 allegations.

12 4. Cross-Complainant LANDSTAR is informed and believes and thereon alleges that
13 at all times herein mentioned each of the Cross-Defendants was the agent and/or employee of the
14 remaining Cross-Defendants, and each of them, and in doing the acts hereafter alleged, were
15 acting within the course and scope of such agency and/or employment and/or with the permission
16 and/or consent the remaining Cross-Defendants, and each of them.

17 5. Cross-Complainant LANDSTAR has been named a party defendant in the
18 Complaint pending in the San Mateo County Superior Court, Action Number 17CIV 05727.

19 6. In its Complaint Plaintiff alleges loss or damage to cargo transported in interstate
20 commerce by Cross-Defendant GHUMAN, or its agents or assigns, due to a traffic accident
21 occurring on or about January 24, 2017. Plaintiff asserts the alleged cargo loss or damage
22 occurred due to the negligence or breach of contract of GHUMAN, and others, including Cross-
23 Complainant LANDSTAR.

24 7. LANDSTAR, as a freight broker, and upon request of other parties, assigned the
25 carriage of the subject cargo to GHUMAN pursuant to a written contract between LANDSTAR
26 and GHUMAN. LANDSTAR never had actual or constructive possession of the subject cargo.
27
28

FIRST CAUSE OF ACTION

BREACH OF WRITTEN CONTRACT

8. Cross-Complainant LANDSTAR realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 7, above, as if fully set forth herein.

9. On or about October 3, 2016 LANDSTAR and GHUMAN entered into a written broker/carrier agreement ("Agreement") by which LANDSTAR, as a freight broker agreed to assign, and GHUMAN, as a licensed interstate motor carrier agreed to transport, cargo shipments.

10. The material provisions of that Agreement include GHUMAN's agreement to defend, indemnify, and hold LANDSTAR harmless from and against all loss, liability, judgments damages, claims, fines, costs or expense, including reasonable attorney's fees, arising out of or in any way related to, GHUMAN's performance of its obligations under the Agreement.

11. After the alleged cargo loss or damage claim described in Paragraph 6, above, LANDSTAR demanded that GHUMAN pay the alleged cargo loss and damage claim, and to defend, indemnify and hold harmless LANDSTAR from those claims asserted by Plaintiff in its Complaint.

12. LANDSTAR has fully performed all conditions, covenants, and promises to be performed on its part under the Agreement.

13. GHUMAN has refused, and continues to refuse, to defend, indemnify and hold LANDSTAR harmless from such claims, in violation and breach of the written terms of the Agreement.

14. As a proximate result of GHUMAN's breach of the Agreement, as herein alleged, LANDSTAR has been damaged in an amount to be proven at trial.

WHEREFORE, LANDSTAR prays for relief as set for below.

SECOND CAUSE OF ACTION

EQUITABLE INDEMNITY

15. LANDSTAR re-alleges and reincorporates each and every allegation contained in the General Allegations, and all previous paragraphs of each preceding cause of action of this Cross-Complaint, as if fully set forth herein.

1 16. LANDSTAR is informed and believes and thereon alleges that GHUMAN, and
2 each Cross-Defendant designated herein as a ROE Cross-Defendant, is negligently, statutorily,
3 vicariously, or otherwise legally responsible in some manner for the claims and damages asserted
4 by Plaintiff in its underlying Complaint, and incorporated herein expressly by reference for the
5 purpose of stating this cause of action only, alleges LANDSTAR caused and contributed to the
6 damages alleged by Plaintiff. LANDSTAR denies that it either caused or contributed to those
7 alleged damages. If, however, it is found that LANDSTAR is responsible under the law for any of
8 the allegations contained the complaint, then LANDSTAR is informed and believes and thereon
9 alleges that the acts and/or omissions Cross-Defendants, and each of them, proximately caused
10 and contributed to the damages alleged by Plaintiff.

11 17. While LANDSTAR denies it either caused or contributed to the damages
12 described in Plaintiff's Complaint, LANDSTAR alleges that if plaintiff was injured as alleged,
13 LANDSTAR's liability for such injuries was passive, secondary and derivative in nature, and the
14 conduct attributable to Cross-Defendants, and each of them, was the direct, active and primary
15 cause of LANDSTAR'S exposure, if any, to liability to Plaintiff herein.

16 18. Because of the foregoing, in equity and good conscience, LANDSTAR is entitled
17 to indemnity form Cross-Defendants, and each of them, for the claims and damages alleged in
18 Plaintiff's Complaint.

19 19. Because of the foregoing, in equity and good conscience, LANDSTAR is also
20 entitled to recover from Cross-Defendants, and each of them, LANDSTAR'S costs of defending
21 the principal action and in prosecuting this Cross-Complaint, including actual attorneys' fees and
22 costs.

23 20. LANDSTAR therefore seeks partial or equitable or total indemnity against Cross-
24 Defendants, and each of them, assume the defense of LANDSTAR, taking such steps as are
25 proper to protect the interests of LANDSTAR including payment of all expenses and judgment
26 against LANDSTAR.

27 21. LANDSTAR necessarily retained the law firm WILLIAMS & GUMBINER LLP
28 to defend this action and prosecute this Cross-Complaint herein, and has incurred legal fees, court

1 costs and discovery costs, and will in the future incur further costs, in an amount according to
2 proof.

3 WHEREFORE, LANDSTAR prays for relief as set for below.
4

5 **THIRD CAUSE OF ACTION**

6 **CONTRIBUTION**

7 22. LANDSTAR re-alleges and reincorporates each and every allegation contained in
8 the General Allegations, and all previous paragraphs of each preceding cause of action of this
9 Cross-Complaint, as if fully set forth herein.

10 23. Cross-Defendants, and each of them, owe a duty of indemnification or
11 contribution to LANDSTAR for any judgment obtained against LANDSTAR in proportion to the
12 percentage of fault, negligence, breach of duty of due care, or other tortuous conduct attributable
13 to Cross-Defendants, and each of them, for the acts and omissions stated above.

14 24. LANDSTAR, therefore, seeks full or partial equitable indemnity or contribution
15 from Cross-Defendants, and each of them, in an amount equal to a portion of any judgment
16 obtained against LANDSTAR in proportion to the percentage of fault, negligence, breach of duty
17 or due care or other tortuous conduct attributable to Cross-Defendants, and each of them.

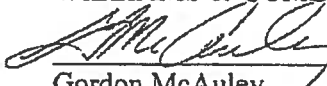
18 WHEREFORE, LANDSTAR prays for relief as set for below.

19 **PRAYER FOR RELIEF**

- 20 1. For general damages according to proof;
21 2. For special damages according to proof;
22 3. For LANDSTAR'S expenses and costs, including attorneys' fees, incurred in this
23 litigation;
24 4. For such other and further relief as this court deems just and proper.

25 DATED: March 1, 2018

WILLIAMS & GUMBINER LLP

26 
27 Gordon McAuley
28 Attorneys for Defendant and Cross-
Complainant LANDSTAR EXPRESS
AMERICA, INC.

PROOF OF SERVICE

Case Name: The Board of Trustees of the Leland Stanford Junior University
San Mateo Superior NO: 17 CIV05727

I, the undersigned, under penalty of perjury, declare that I am a citizen of the United States, over the age of 18 years and not a party to the within entitled cause of action. My business address is 100 Drakes Landing Road, Suite 260, Greenbrae, California 94904, and I am employed in Marin County, California. On March 1, 2018, I served a true copy of:

ANSWER OF LANDSTAR EXPRESS AMERICA, INC.**CROSS-COMPLAINT FOR BREACH OF CONTRACT; EQUITABLE INDEMNITY; AND CONTRIBUTION**

I caused to be served said document on the following parties involved as follows:

Keith C. Bower, Esq.
Bower Von Raesfeld
900 Lafayette Street, Suite 706
Santa Clara, CA 95050
408/261-1200
Fax: 408/985-9042
kcb@bowervonraesfeld.com
Attorney for Plaintiff

	By facsimile machine (FAX) by personally transmitting a true copy thereof via an electronic facsimile machine between the hours of 9:00 a.m. and 5:00 p.m.
X	By First Class Mail by depositing sealed envelopes in the United States mail at Greenbrae, California with postage fully prepaid.
	E-Service: via File & ServeXpress.
	By Personal Delivery: I caused each such envelope above to be delivered by hand to the office of each addressee noted.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on March 1, 2018, at Greenbrae, California.


Victoria Fedoroff

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4/20
CMC

1 Gordon McAuley (99932)
2 WILLIAMS & GUMBINER LLP
3 100 Drakes Landing Road, Suite 260
4 Greenbrae, CA 94904
5 Phone: (415) 755-1880
6 gmcauley@williamsgumbiner.com
7
8 Attorneys for Defendant
9 LANDSTAR EXPRESS AMERICA, INC.

FILED
SAN MATEO COUNTY

MAR 01 2018

Clerk of the Superior Court
By [Signature]
DEPUTY CLERK

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO

11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR UNIVERSITY,
13
14 Plaintiff,
15
16 vs.
17 TRUMP CARD, INC., et al.,
18 Defendants.

Case No. 17 CIV 05727

**ANSWER OF LANDSTAR EXPRESS
AMERICA, INC.**

Complaint Filed: 12/14/17
Trial Date: n/a

File By Fax

18 Defendant LANDSTAR EXPRESS AMERICA, INC. answers Plaintiff THE BOARD OF
19 TRUSTEES OF THE LELAND STANDORD JUNIOR UNIVERSITY'S unverified complaint as
20 follows:

21 Except as expressly admitted, pursuant to Section 431.30(d) of the California Code of
22 Civil Procedure, Defendant generally denies each and every allegation in the Complaint.
23 Defendant further denies, both generally and specifically, that Plaintiff is, has been, or will be
24 damaged as otherwise alleged by any act or omission of Defendant, or that Plaintiff is, or will be,
25 entitled to any relief against Defendant, either as alleged or otherwise.

17 - CIV - 05727
ARDU
Answer (Unlimited)
1006358



AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

1. The Complaint, and each cause of action therein, fails to state a cause of action against this Answering Defendant.

SECOND AFFIRMATIVE DEFENSE

2. The Complaint, and each cause of action therein, is barred by the doctrine of waiver.

THIRD AFFIRMATIVE DEFENSE

3. The Complaint, and each cause of action therein, is barred by the doctrine of estoppel.

FOURTH AFFIRMATIVE DEFENSE

4. The Complaint, and each cause of action therein, is barred by the doctrine of Unclean Hands.

FIFTH AFFIRMATIVE DEFENSE

5. The Complaint, and each cause of action therein, is barred by the contracts between the parties, including without limitation, Plaintiff's contracts with each Defendant.

SIXTH AFFIRMATIVE DEFENSE

6. The Complaint, and each cause of action therein, is barred by Defendant Ghuman Transport Company's breach of contract.

SEVENTH AFFIRMATIVE DEFENSE

7. The Complaint, and each cause of action therein, is barred by the principal of equitable indemnity.

EIGHTH AFFIRMATIVE DEFENSE

8. The Complaint, and each cause of action therein, is barred by the principal of payment.

NINTH AFFIRMATIVE DEFENSE

9. Defendant denies that Plaintiff was damaged in the amount alleged in its Complaint, or in any amount at all.

TENTH AFFIRMATIVE DEFENSE

10. Plaintiff had full knowledge of all risks involved in its actions, and voluntarily assumed the risk of the injury and damage of which it complains.

ELEVENTH AFFIRMATIVE DEFENSE

11. Plaintiff's injuries, if any, were caused or contributed to by the carelessness, negligence, or fault of persons or entities other than this responding Defendant.

TWELFTH AFFIRMATIVE DEFENSE

12. The legal determination of the rights and obligations between the parties is subject to state law, rather than federal law.

THIRTEENTH AFFIRMATIVE DEFENSE

13. Plaintiff's damages, if any, are limited by the Carmack Amendment to the Interstate Commerce Act, 49 U.S.C. Section 14707.

FOURTEENTH AFFIRMATIVE DEFENSE

14. Plaintiff's damages, if any, are limited by contractual agreement.

FIFTEENTH AFFIRMATIVE DEFENSE

15. Defendant performed all obligations owed to Plaintiff, except those obligations Defendant was prevented or excused from performing by the acts and or omissions of Plaintiff, or other persons.

SIXTEENTH AFFIRMATIVE DEFENSE

16. Defendants are informed and believe that they complied with the instructions of Plaintiffs where applicable for the services at issue.

SEVENTEENTH AFFIRMATIVE DEFENSE


17. Defendants reserve the right to assert additional affirmative defenses in the event that additional defenses become apparent during the course of this litigation.

1 **WHEREFORE, DEFENDANT** prays for judgment as follows:

- 2 1. That Plaintiff take nothing by way of its Complaint, and judgment re rendered in
3 favor of Defendant;
4 2. Defendant be awarded attorney fees and costs of suit herein;
5 3. For such other and further relief as the Court deems just and proper.
6

7 DATED: March 1, 2018

WILLIAMS & GUMBINER LLP

8
9 
10 Gordon McAuley
11 Attorneys for Defendant
LANDSTAR EXPRESS AMERICA, INC.

12 G:\CLIENT DOCUMENTS\Landstar Express\Pleadings\Complaint, Answers and XCs\2018-02-27 Answer.doc
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PROOF OF SERVICE

Case Name: The Board of Trustees of the Leland Stanford Junior University
San Mateo Superior NO: 17 CIV05727

I, the undersigned, under penalty of perjury, declare that I am a citizen of the United States, over the age of 18 years and not a party to the within entitled cause of action. My business address is 100 Drakes Landing Road, Suite 260, Greenbrae, California 94904, and I am employed in Marin County, California. On March 1, 2018, I served a true copy of:

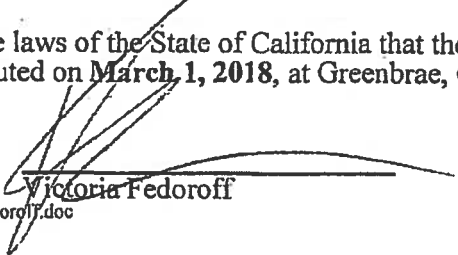
ANSWER OF LANDSTAR EXPRESS AMERICA, INC.**CROSS-COMPLAINT FOR BREACH OF CONTRACT; EQUITABLE INDEMNITY; AND CONTRIBUTION**

I caused to be served said document on the following parties involved as follows:

Keith C. Bower, Esq.
Bower Von Raesfeld
900 Lafayette Street, Suite 706
Santa Clara, CA 95050
408/261-1200
Fax: 408/985-9042
kcb@bowervonraesfeld.com
Attorney for Plaintiff

	By facsimile machine (FAX) by personally transmitting a true copy thereof via an electronic facsimile machine between the hours of 9:00 a.m. and 5:00 p.m.
X	By First Class Mail by depositing sealed envelopes in the United States mail at Greenbrae, California with postage fully prepaid.
	E-Service: via File & ServeXpress.
	By Personal Delivery: I caused each such envelope above to be delivered by hand to the office of each addressee noted.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on March 1, 2018, at Greenbrae, California.


Victoria Fedoroff

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1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

5 Attorneys for Plaintiff
6 THE BOARD OF TRUSTEES OF THE
7 LELAND STANFORD JUNIOR UNIVERSITY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

10 THE BOARD OF TRUSTEES OF THE
11 LELAND STANFORD JUNIOR
UNIVERSITY,

12 Plaintiff,

13
14 v.

15 TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
16 TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
17 TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
18 CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
19 California corporation); MAGNATE
20 HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
21 LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
22 California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
23 LLC (a California corporation and LLC);
24 TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
25 TURNER (a California resident); and DOES
1 to 50, inclusive;

26 Defendants.
27

Case No.: 17 CIV 05727

**PLAINTIFF THE BOARD OF
TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY'S
STATEMENT OF DAMAGES**

Complaint Filed: December 14, 2017
Trial Date: TBA

28 -1-

PLAINTIFF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S
STATEMENT OF DAMAGES

1 Plaintiff, The Board of Trustees of the Leland Stanford Junior University, hereby
2 submits the following statement of damages:

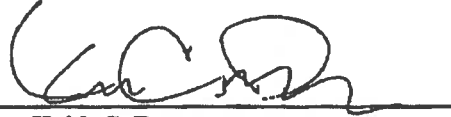
3	Property damage to magnetic undulator:	\$350,000.00
4	Loss of use of magnetic undulator:	\$150,000.00
5	Redesign costs due to damage to equipment:	\$ 95,000.00
6	Towing of magnetic undulator to Chicago for repair after accidents:	\$ 3,500.00
7	Prejudgment interest (at 10%) from date of accident :	\$36,000.00/year and growing
8	Attorneys' fees:	<u>\$200,000.00</u>
9	Total damages (excluding costs of suit and post judgment interest):	\$834,500.00

10 Respectfully Submitted,

11 BOWER • von RAESFELD

12
13 Dated: February 6, 2018

14 by:


Keith C. Bower
Attorney for Plaintiff
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY

SUM-110

SUMMONS
Cross-Complaint
(CITACION JUDICIAL-CONTRADEMANDA)

NOTICE TO CROSS-DEFENDANT:

(AVISO AL CONTRA-DEMANDADO): GHUMAN TRANSPORT CORPORATION and ROES 1 THROUGH 50,

YOU ARE BEING SUED BY CROSS-COMPLAINANT:

(LO ESTÁ DEMANDANDO EL CONTRADEMANDANTE):
 LANDSTAR EXPRESS AMERICA, INC.

FOR COURT USE ONLY
 (SOLO PARA USO DE LA CORTE)
FILED
SAN MATEO COUNTY

MAR 01 2018

Clerk of the Superior Court
 By DEPUTY CLERK

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the cross-complainant. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al contrademandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), o onlándose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of San Mateo

400 County Center

Redwood City, CA 94063

The name, address, and telephone number of cross-complainant's attorney, or cross-complainant without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del contrademandante, o del contrademandante que no tiene abogado, es):

Williams & Gumbiner LLP

100 Drakes Landing Road, Suite 260, Greenbrae, CA 94904

DATE:

(Fecha)

MAR 01 2018

RODINA M. CATALANO

Clerk, by
 (Secretario)

415-755-1880

Deputy
 (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons (POS-010).)

SHORT NAME OF CASE (from Complaint): (Nombre de Caso):

CASE NUMBER: (Número del Caso):

17CIV05727

(SEAL)

**NOTICE TO THE PERSON SERVED: You are served**

1. ☐ as an individual cross-defendant.
 2. ☐ as the person sued under the fictitious name of (specify):

3. ☐ on behalf of (specify):

- under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)

☐ other (specify):

4. ☐ by personal delivery on (date):

17-CIV-05727
 SCCOMP
 Summons Cross-Complaint for Civil Division
 1006387



SUM-100

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS**

**YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY**

**ENDORSED FILED
SAN MATEO COUNTY**

DEC 14 2017

**Clerk of the Superior Court
UNA FINAL
DEPUTY CLERK**

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO!) Le han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que se procese su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de solicitud de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que busque a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de referidos a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio Web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a retener las cuotas y los costos conjuntos para imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desahogar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Hower von Reszafel
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

DATE: **DEC 14 2017**

RODINA M. CATALANO

Clerk by
(Secretario)

JIA JIA

408-261-1200
(Deputy
(Adjunto))

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).
(Para prueba de entrega de este citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): **Magnate Holdings, LLC (corporate status unknown)**

- under: ☐ CCP 418.10 (corporation) ☐ CCP 418.80 (minor)
☐ CCP 418.20 (defunct corporation) ☐ CCP 418.70 (conservatee)
☐ CCP 418.40 (association or partnership) ☐ CCP 418.80 (authorized person)

4. ☒ other (specify): **415.95 Business Organization, Item Unknown**
5. ☒ by personal delivery on (date): **12/18/17**

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. July 1, 2008)

SUMMONS

Page 1 of 1
Code of Civ. Procedure §§ 412.20, 455
www.courtinfo.ca.gov
Mandatory City & County Summons

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY

**ENDORSED FILED
SAN MATEO COUNTY**

DEC 14 2017

Clerk of the Superior Court
by UNA FINAU
Deputy Clerk

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information of the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups of the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información e continúe.)

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen este citación y papeles legales para presentar una respuesta por escrito en este corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal como lo dicen que procesan su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov), en la biblioteca de leyes de su condado o en la parte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

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The name and address of the court is:

(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower van Rensselaer
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

408-261-1200

DATE: **DEC 14 2017**
(Fecha)

RODINA M. CATALANO

Clerk, by
(Secretario)

UNA FINAU

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

1521

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify):

- under: ☐ CCP 418.10 (corporation) ☐ CCP 418.80 (minor)
☐ CCP 418.20 (defunct corporation) ☐ CCP 418.70 (conservatee)
☐ CCP 418.40 (association or partnership) ☐ CCP 418.90 (authorized person)

- ☒ other (specify): LLC

4. ☒ by personal delivery on (date): 12/14/17

SUMMONS

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. July 1, 2009)

Page 1 of 1
Code of Civ. Procedure §§ 412.20, 408
www.courtinfo.ca.gov
Minimum Size of Paper: Minimum

SUM-200(A)

SHORT TITLE: STANFORD UNIVERSITY v. TRUMP CARD, INC., et al.	CASE NUMBER:
--	--------------

INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
 → If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment Form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff ☒ Defendant ☐ Cross-Complainant ☐ Cross-Defendant

TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING LLC (a California corporation and LLC); TRANS XPRESS LINE, INC. (a California corporation); JERMAINE MARKEPS TURNER (a California resident); and DOES 1 to 50, inclusive

Page 1 of 1

Page 1 of 1

Form Adopted for Mandatory Use
 Judicial Council of California
 SUM-200(A) (Rev. January 1, 2007)

ADDITIONAL PARTIES ATTACHMENT
 Attachment to Summons

Westlaw Doc 9 Form 900000

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

ENDORSED FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court
UNA FINAL
CLERK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form. If you want the court to hear your case, there may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to sell an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.)

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito debe que estar en forma legal como si desea que se procesen su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de derivación a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desahar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reasfeld
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

DATE:

DEC 14 2017

RODINA M. CATALANO

Clerk, by
(Secretario)

JIA JIA

408-261-1200

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de este citación use el formulario Proof of Service of Summons, (POS-010)).

18EN1

NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☒ as the person sued under the fictitious name of (specify): (dba TrumpCard San Diego)
- ☒ on behalf of (specify): Tiflor Transportation LLC (a California LLC) (dba TrumpCard San Diego)
under: ☐ CCP 418.10 (corporation) ☐ CCP 418.80 (minor)
☐ CCP 418.20 (defunct corporation) ☐ CCP 418.70 (conservatee)
☐ CCP 418.40 (association or partnership) ☐ CCP 418.90 (authorized person)
- ☒ other (specify): LLC ☐ by personal delivery on (date): 12/18/17 JIA JIA

Form adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. Jan. 1, 2002)

SUMMONS

Page 1 of 1
Code of Civ. Procedure §§ 412.20, 416
www.courtinfo.ca.gov
Vendors Due & Have Number

EXHIBIT A

89

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY

FOR COURT USE ONLY
BOLSO PARA USO DE LA CORTE

ENDORSED FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court
UNA FINAL
CLERK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información e continuación.)

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que la corte procesen su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida el formulario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otras regulaciones legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de derivación a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos extras por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recíde mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desestimar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reesfeld
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

408-261-1200

DATE: **DEC 14 2017**
(Fecha)

RODINA M. CATALANO

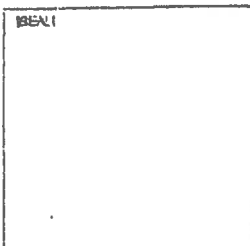
Clerk, by
(Secretario)

UNA FINAL

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010).)



NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):

- ☒ on behalf of (specify): **Trump Card California, Inc. (a California Corporation & LLC)**

- under:
- | | |
|--|---|
| <input checked="" type="checkbox"/> CCP 418.10 (corporation) | <input type="checkbox"/> CCP 418.80 (minor) |
| <input type="checkbox"/> CCP 418.20 (defunct corporation) | <input type="checkbox"/> CCP 418.70 (conservatee) |
| <input type="checkbox"/> CCP 418.40 (association or partnership) | <input type="checkbox"/> CCP 418.90 (authorized person) |

- ☒ other (specify):

- ☒ by personal delivery on (date): **2/8**

Form adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. July 1, 2009)

SUMMONS

Page 1 of 1
Code of Civ. Procedure § 412.20, 418
www.courtinfo.ca.gov
Wasteful Use of Paper Prohibited

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

ENDORSED FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court
UNA FINCA
DEPUTY CLERK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO) Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información e continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal como se dice en el proceso su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida el subsidio de la corte que le dé un formulario de extensión de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de derivación a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibido mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

CASE NUMBER:
(Número del Caso):

17C1V05727

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Ressefeld
900 Lafayette Street, Suite 200, SANTA CLARA, CA 95050

408-261-1200

DATE: DEC 14 2017
(Fecha)

RODINA M. CATALANO

Clerk, by
(Secretario)

J. J. J. J.

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

BSX1

NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
Trump Card Holdings, Inc. (a California Corporation & LLC)
- ☒ on behalf of (specify):
under, ☐ CCP 418.10 (corporation) ☐ CCP 418.80 (minor)
☐ CCP 418.20 (defunct corporation) ☐ CCP 418.70 (conservatee)
☐ CCP 418.40 (association or partnership) ☐ CCP 418.60 (authorized person)
☒ other (specify): LLC
- ☒ by personal delivery on (date): 7/8 E.P. Wlo

Form adopted for Mandatory Use
Judicial Council of California
JWS-100 (Rev. Jan. 1, 2009)

SUMMONS

Code of Civ. Procedure §§ 412.20, 496
www.courtinfo.ca.gov
Must be Filed & Served Electronically

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC); SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY

SUM-100

FOR COURT USE ONLY
SOLO PARA USO DE LA CORTE

ENDORSED FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court
by **UNA FINA**
Deputy Clerk

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from this court.

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Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en este corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito debe que estar en forma legal correcta o de otra forma procesen su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida el exento de la corte que le dé un formulario de exención de pago de cuotas. Si no presente su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de derivación a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desear el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reszfeld
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

DATE: **DEC 14 2017**
(Fecha)

RODINA M. CATALANO

Clerk, by
(Secretario)

UNA FINA

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

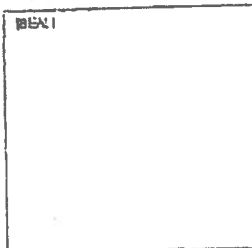
3. ☒ on behalf of (specify):
under: ☒ CCP 418.10 (corporation)

- ☐ CCP 418.20 (defunct corporation)
☐ CCP 418.40 (association or partnership)

- ☒ other (specify): **LLC**

4. ☒ by personal delivery on (date): **12/18**

- ☐ CCP 418.80 (minor)
☐ CCP 418.70 (conservatee)
☐ CCP 418.80 (authorized person)



Form adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. July 1, 2009)

SUMMONS

Page 1 of 1
Code of Civ. Procedure §§ 41220, 485
www.courtinfo.ca.gov
Members Don't Pay a Fee